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Attorneys for Defendant John Deere Shared Services, LLC

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

EMERALD SITE SERVICES, INC., a)	Case No. 2-23-cv-02982-DJC-AC
California Corporation,)	<i>[The Honorable Daniel J. Calabretta]</i>
)	
Plaintiff,)	
)	STIPULATION AND PROPOSED
v.)	ORDER AMENDING SCHEDULE
)	
PAPÉ MACHINERY, INC., an Oregon)	
Corporation; JOHN DEERE)	
CONSTRUCTION & FORESTRY)	
COMPANY, a Delaware Corporation;)	
DEERE & COMPANY, a Delaware)	
Corporation; and DOES 1-100, inclusive,)	
)	
Defendants.)	
_____)	

The parties to this action, Emerald Site Services, Inc., Papé Machinery, Inc., and John Deere Shared Services, LLC, stipulate as follows:

Whereas the Stipulation and Order Amending Schedule dated 11/14/25 (ECF No. 30) provides for the following schedule regarding the filing of dispositive motions:

Dispositive Motion Filing Deadline:	12/10/2025
Oppositions:	12/30/2025
Replies:	1/9/2026
Dispositive Motion Hearing Date:	2/19/2026 at 1:30 p.m.

Whereas the parties have met and conferred and propose to continue the current dates related to the parties' dispositive motions as follows, with the current pretrial conference and trial dates to remain unchanged:

Dispositive Motion Filing Deadline:	1/12/2026
Oppositions:	2/2/2026
Replies:	2/12/2026
Dispositive Motion Hearing Date:	3/19/2026 at 1:30 p.m.
Final Pretrial Conference:	8/20/2026 at 1:30 p.m.
Jury Trial:	10/5/2026 at 8:30 a.m.

Therefore, the parties request that the Court issue an order amending the schedule as set forth above.

IT IS SO STIPULATED.

Dated: December 4, 2025

KROGH & DECKER, LLP

By: /s/ Trevor A. White
(As authorized on 12/4/25)
SHAWN M. KROGH
TREVOR A. WHITE
Attorneys for Plaintiff
EMERALD SITE SERVICES, INC.

Dated: December 4, 2025

LEWIS BRISBOIS BISGAARD & SMITH LLP

By: /s/ Graham M. Cridland
(As authorized on 12/4/25)
CHARLES S. PAINTER
GRAHAM M. CRIDLAND
Attorneys for Defendant
PAPÉ MACHINERY, INC.

Dated: December 4, 2025

THE RYAN LAW GROUP

By: /s/ Rebekka R. Martorano
TIMOTHY J. RYAN
REBEKKA R. MARTORANO
Attorneys for Defendant
JOHN DEERE SHARED SERVICES, LLC

ORDER

Pursuant to the stipulation of the parties, the Stipulation and Order Amending Schedule dated 11/14/25 (ECF No. 30) is further amended as follows:

Dispositive Motion Filing Deadline:	1/12/2026
Oppositions:	2/2/2026
Replies:	2/12/2026
Dispositive Motion Hearing Date:	3/19/2026 at 1:30 p.m.
Final Pretrial Conference:	8/20/2026 at 1:30 p.m.
Jury Trial:	10/5/2026 at 8:30 a.m.

Dated: December 5, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE